

EXHIBIT F

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Case No. 2:19-md-02904-MCA-MAH

- - - - -x
:
IN RE: AMERICAN MEDICAL COLLECTION:
AGENCY, INC., CUSTOMER DATA :
SECURITY BREACH LITIGATION :
:
:
- - - - -x

February 8, 2023
8:05 a.m.
787 Seventh Ave.
New York, NY

VIDEOTAPED IN-PERSON AND REMOTE
DEPOSITION UPON ORAL EXAMINATION OF RUSSELL
FUCHS, held at the above-mentioned time and
place, before Randi Friedman, a Registered
Professional Reporter, within and for the State
of New York.

1 APPEARANCES:

2 ROBBINS GELLER RUDMAN & DOWD, LLP
3 Attorneys for Plaintiffs

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11 BY: HEATHER SULTANIAN, ESQ.
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15 Inc.
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24
25 (Appearances continued.)

(Appearances continued.)

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* * *

ALSO PRESENT:

Joe Raguso - Videographer

Lance Hoepfner - Concierge

1 action, nor am I financially interested in
2 the outcome. Appearances have been noted on
3 the stenographic record, and the court
4 reporter now swear in the witness.

5 * * *

6 RUSSELL FUCHS, the witness herein,
7 after first having been duly sworn, was
8 examined and testified as follows:

9 * * *

10 EXAMINATION

11 BY MS. SULTANIAN:

12 Q Good morning, Mr. Fuchs. My name is
13 Heather Sultanian and I represent Quest
14 Diagnostics, Incorporated.

15 Can you please state and spell your
16 full name for the record?

17 A Russell Fuchs, R-U-S-S-E-L-L,
18 F-U-C-H-S.

19 Q You understand that you're under oath
20 and you must tell the truth today, as if you were
21 in a court of law?

22 A Yes.

23 Q Are you under the influence of any
24 medication that would impair your ability to give
25 testimony today?

1 that point in time.

2 Q Did the CHAMP database remain a call
3 center system between 2016 and 2019?

4 A Yes.

5 Q How did -- let me back up.

6 Did call center employees use the
7 CHAMP database?

8 A They used the CHAMP system.

9 Q CHAMP system.

10 How did call center employees use the
11 CHAMP system?

12 A The CHAMP system ran the call center.

13 Q Could call center employees access the
14 CHAMP system to obtain information about debtors?

15 A Yes.

16 Q Did other AMCA employees aside from
17 the call center have access to the CHAMP
18 database?

19 A Yes.

20 Q Was there ever a portal for external
21 users to use the CHAMP database?

22 A There was the ability for external
23 users to use the database.

24 Q Could clients use the database?

25 A Yes.